**UNITED STATES DISTRICT COURT**
**FOR THE SOUTHERN DISTRICT OF GEORGIA**
**SAVANNAH DIVISION**

| | | |
|---|---|---|
| **DEBORAH SIMMONS,**<br><br>**Plaintiff,**<br><br>**v.**<br><br>**CHATHAM COUNTY SHERIFF'S DEPARTMENT, and GLORIA WILSON, individually and in her official capacity as a Captain with the Sheriff's Department of Chatham County, Georgia, and THOMAS M. GILBERG, individually and in his official capacity as a Lt. Colonel with the Sheriff's Department of Chatham County, Georgia; AL ST. LAWRENCE, individually and in his official capacity as Sheriff of Chatham County, Georgia,**<br><br>**Defendants.** | * * * * * * * * * * * * * * * * * * * * * * * | **CIVIL ACTION NO.: 4:14-00167** |

**NOTICE TO TAKE DEPOSITION OF DEBORAH SIMMONS**

To: Deborah Simmons
c/o Wesley Wolff
408 East Bay Street
Savannah, Georgia 31401

You are hereby notified that on **Wednesday, May 6, 2015**, beginning at **9:30 a.m.**, I will proceed to take the deposition of DEBORAH SIMMONS, upon oral examination pursuant to U.S.C.S. Federal Rules of Civil Procedure Rule 30, for any and all purposed allowed under the United Stated Federal Rules of Civil Procedure. The deposition will take place at the office of Wesley Wolff, 408 East Bay Street, Savannah, Georgia, 31401 before a qualified court reporter or an officer duly authorized to administer oaths, and will be recorded by stenographic means. This deposition will continue from day to day until such examination is completed for the purpose of discovery, cross-examination, preservation of evidence for use at trial, and any other purpose allowed by law.

This 20th day of April, 2015.

/s/ Abda Lee Quillian_____
ABDA LEE QUILLIAN
State Bar No. 590090
*Attorney for Defendants*

Tate Law Group
2 East Bryan Street Suite 600
Savannah, Georgia 31401
T: (912) 234-3030
Email: alqlaw@yahoo.com

**UNITED STATES DISTRICT COURT**
**FOR THE SOUTHERN DISTRICT OF GEORGIA**
**SAVANNAH DIVISION**

| | | |
|---|---|---|
| **DEBORAH SIMMONS,** | * | |
| | * | |
| **Plaintiff,** | * | |
| | * | |
| | * | **CIVIL ACTION NO.:** |
| **v.** | * | **4:14-00167** |
| | * | |
| | * | |
| **CHATHAM COUNTY SHERIFF'S DEPARTMENT, et al.,** | * | |
| | * | |
| | * | |
| **Defendants.** | * | |
| | * | |

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 20th day of April, 2015, I electronically filed the foregoing Notice to take Deposition of Deborah Simmons with the Clerk of Court by using the CM/ECF system which will cause a copy of the same to be served on the following counsel:

S. WESLEY WOLFF
408 EAST BAY STREET
SAVANNAH, GEORGIA 31401

This 20th day of April, 2015.

/s/ Abda Lee Quillian________
ABDA LEE QUILLIAN
Georgia State Bar No. 590090
*Attorney for Defendants*

Tate Law Group
2 East Bryan Street Suite 600
Savannah, Georgia 31401
T: (912) 234-3030